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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., DAVID  
ESPINOZA, and CHRISTOPHER  
MILLS, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

LG ELECTRONICS, INC., LG  
ELECTRONICS U.S.A., INC.,  
SAMSUNG ELECTRONICS CO. LTD.,  
SAMSUNG ELECTRONICS  
AMERICA, INC., SONY  
CORPORATION, and SONY  
ELECTRONICS CORPORATION,

And

John and Jane Does (1-Unlimited)

And

ABC Corporations (1-Unlimited),

Defendants.

Civil Action No. 17-1775  
(MCA)(SCM)

Hon. Madeline Cox Arleo, U.S.D.J.  
Hon. Steven C. Mannion, U.S.M.J.

**Return Date: October 2, 2017**

(Oral Argument Requested)

*Document Electronically Filed*

**NOTICE OF MOTION TO  
DISMISS BY DEFENDANTS LG  
ELECTRONICS U.S.A., INC.  
AND SAMSUNG  
ELECTRONICS  
AMERICA, INC.**

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**PLEASE TAKE NOTICE** that on October 2, 2017, at 9:30 a.m., or at such  
other date and time as may be set by the Court, Defendants LG Electronics U.S.A.,

Inc. and Samsung Electronics America, Inc. (collectively, “Defendants”), by and through their undersigned attorneys, will move before the Honorable Madeline Cox Arleo, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4A, Newark, New Jersey 07101, for an Order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing the Complaint.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Defendants will rely on the accompanying Joint Brief in Support of their Motion to Dismiss the Complaint under Fed. R. Civ. P. 12(b)(6), and all pleadings and proceedings on file.

**PLEASE TAKE FURTHER NOTICE** that a Proposed form of Order is being submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that Defendants hereby request oral argument.

Dated: September 8, 2017

Respectfully submitted,

GIBBONS P.C.

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